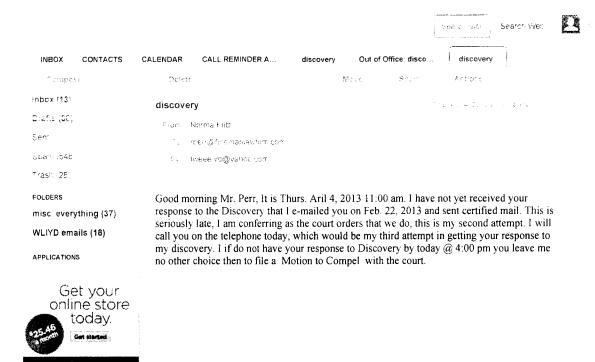
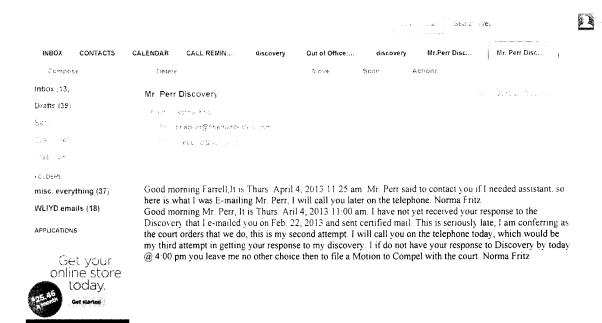


EMIBIT A 1

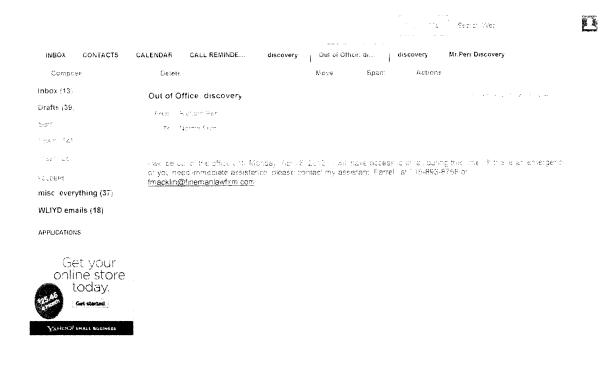


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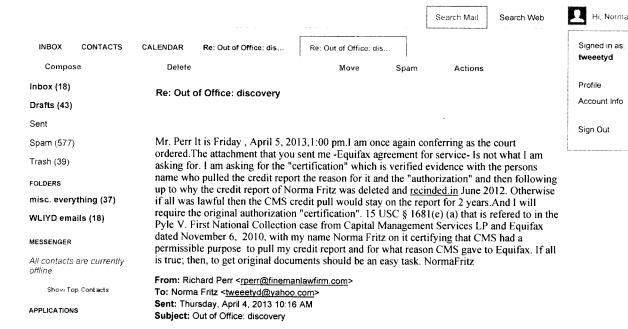


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(13 unread) - tweeetyd - Yahoo! Mail Case 2:12-cv-01725-TFM Document 21-1 Filed 04/22/13 Page 4 of 7



I will be out of the office until Monday, April 8, 2013. I will have access to email during this time. If this is an emergency, or you need immediate assistance, please contact my assistant, Farrell, at 215-893-8758 or



fmacklin@finemanlawfirm.com.

A-5

Hi, Norma

Themes

Mail Plus

Help

Privacy

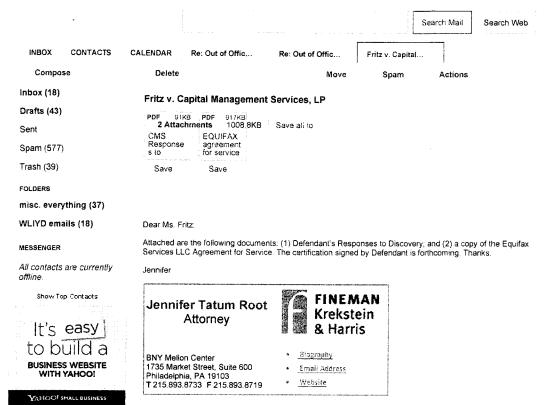
Legal

Mail Options

Messenger Options

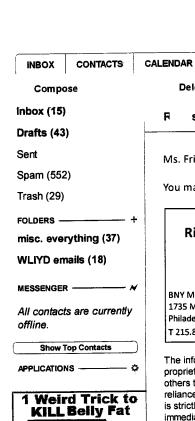
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RE: 1st.conferring di... Cruise from just \$199...

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Actions

st.conferring discovery requests

from Richard Perr to yoMon, 4:03 PM

Ms. Fritz:

You may file your motion. You have received everything that CMS has.

Richard J. Perr Attorney



BNY Meilon Center 1735 Market Street, Suite 600 Biography Email Address

Philadelphia, PA 19103 T 215.893.8724 F 215.893.8719

Website

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From: Norma Fritz [mailto:tweeetyd@yahoo.com]

Sent: Monday, April 08, 2013 3:56 PM

To: Richard Perr

Respectfully, Norma Fritz

Cc: tweeetyd@yahoo.com

Subject: 1st.conferring discovery requests

FRITZYCAPITAL MANAGEMENT SERVICES --- CIVIL ACTION NO.

12-1725

Mr. Perr, It is Monday April 8, 2013. You and CMS have failed to produce any verified evidence in any form that CMS was retained by any original creditor to collect from Plaintiff Norma Fritz, You have failed to cooperate in Discovery, Your Discovery was 12 days late, and you have not produced the documents I requested.. I am conferring (first time) as ordered by court before filing my Motion to Compel. Production of Documents, NO. S 1,2,6,7,8, you state see documents from the ENE session. These documents(electronic phone call recording and statement of accounts) these documents do not prove you have permissible purpose. In fact under Federal rules of EVIDENCE these documents are inadmissible. No.3 You say CMS did not purchase, did CMS acquire in pool of debt, provide documents. No.5 and 9You state see attached. The attached service agreement is not the contract I am requesting...Request for Admissions Question 3-you deny needing a competent fact witness with first hand

Documents needed from CMS: Production of Documents -Question 1. The Plaintiff requires the 'Original contract with signature of Plaintiff and alleged original creditor" (Citibank, Chase, Northland) and original statements to prove plaintiff 'initiated" this alleged debt for CMS to have a permissible purpose Question 4. Original contract with plaintiffs name and date that CMS contracts with original alleged creditor(Citi Bank, Chase, Northland) to prove Assignment /principal/agency relationship. Question-5. The plaintiff requires "certification" The contract with the Plaintiffs name and date that CMS contracts with Equifax to have a legal right to have a permissible purpose. Must include: 1-Persons name who pulled the credit report.2-verify and certifing they have a legal right (permissible purpose)3 -reason why CMS pulled credit report 4 -certify this is a authenticated and validated debt. Request for admissions questio-no.3-Plaintiff requires the name and address of a competent fact witness with firsthand personal knowledge from CMS that has personally worked with the alleged account between the plaintiff and the defendant who can testify under oath that plaintiff agreed to any of the terms and conditions of the alleged agreement or contract that plaintiff initiated that would authorize CMS to inquire into plaintiffs credit report documents in original, authenticated form to the Plaintiff

NaChe